## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

CHERYL GEARY-ROTHENBERG,	
on behalf of herself and all others similarly situated,	Case No: 1:18-cv-00334-CCR
Plaintiff,	)
v.	
	NOTICE OF REQUEST TO
	ENTER DEFAULT JUDGMENT
ABILITY RECOVERY SERVICES, LLC,	FOR SUM CERTAIN
Defendant,	

## NOTICE OF MOTION FOR ENTRY OF DEFAULT JUDGMENT

## TO ALL PARTIES AND ATTORNEYS OF RECORD:

**NOTICE IS HEREBY GIVEN** that Plaintiff, Cheryl Geary-Rothenberg, requests that entry of judgment by default for sum certain be entered against Defendant, Ability Recovery Services, LLC, pursuant to Federal Rule of Civil Procedure 55(b)(1). In support of this request Plaintiff relies upon the record in this case and the affidavits submitted herein.

Dated: December 13, 2018 Respectfully Submitted,

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